

Fill in this information to identify the case:

Debtor 1 _____

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: _____ District of _____
(State)

Case number _____

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor:

Court claim no. (if known): _____

Last 4 digits of any number you use to identify the debtor's account:

Property address:

Number Street

City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☐ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: ____/____/____
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: ____/____/____
MM / DD / YYYY

* Suspense Balance IAO \$564.13

Debtor 1

First Name

Middle Name

Last Name

Case number (if known)

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☐ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X

Signature

Date ____/____/____

Print

First Name

Middle Name

Last Name

Title

Company

If different from the notice address listed on the proof of claim to which this response applies:

Address

Number

Street

City

State

ZIP Code

Contact phone (____) ____-____

Email _____

Pmt Due/Comments	Amt Due	Date Received	Amt Rec'd	Pmt Satisfied	To/From Suspense	Suspense Balance
Begin Suspense					\$ -	\$ -
	\$ 567.30	1/31/2020	\$ 567.30	2/1/2020	\$ -	\$ -
		3/2/2020	\$ 250.00		\$ 250.00	\$ 250.00
		4/21/2020	\$ 35.19		\$ 35.19	\$ 285.19
	\$ 567.30	4/21/2020	\$ 564.81	3/1/2020	\$ (2.49)	\$ 282.70
		5/28/2020	\$ 35.19		\$ 35.19	\$ 317.89
	\$ 567.30	5/28/2020	\$ 564.81	4/1/2020	\$ (2.49)	\$ 315.40
	\$ 567.30	6/9/2020	\$ 600.00	5/1/2020	\$ 32.70	\$ 348.10
	\$ 567.30	7/7/2020	\$ 567.30	6/1/2020	\$ -	\$ 348.10
	\$ 567.30	8/14/2020	\$ 567.30	7/1/2020	\$ -	\$ 348.10
	\$ 567.30	9/10/2020	\$ 567.30	8/1/2020	\$ -	\$ 348.10
	\$ 567.30	10/22/2020	\$ 567.30	9/1/2020	\$ -	\$ 348.10
	\$ 567.30	12/3/2020	\$ 567.30	10/1/2020	\$ -	\$ 348.10
	\$ 567.30	12/31/2020	\$ 567.30	11/1/2020	\$ -	\$ 348.10
	\$ 567.30	4/6/2021	\$ 900.00	12/1/2020	\$ 332.70	\$ 680.80
	\$ 567.30	9/11/2021	\$ 500.00	1/1/2021	\$ (67.30)	\$ 613.50
		9/18/2021	\$ (500.00)		\$ (500.00)	\$ 113.50
		8/25/2022	\$ 903.19		\$ 903.19	\$ 1,016.69
		9/2/2022	\$ (903.19)		\$ (903.19)	\$ 113.50
		9/12/2022	\$ 903.19		\$ 903.19	\$ 1,016.69
Loan Mod Adj	\$ (346.85)				\$ 346.85	\$ 1,363.54
Loan Mod eff 10/1/22					\$ -	\$ 1,363.54
		10/12/2022	\$ (903.19)		\$ (903.19)	\$ 460.35
		10/21/2022	\$ 851.29		\$ 851.29	\$ 1,311.64
Corp Adv Paid	\$ 796.24	1/17/2023			\$ (796.24)	\$ 515.40
		3/16/2023	\$ 48.73		\$ 48.73	\$ 564.13
9/1/2022	\$ 609.94				\$ (609.94)	\$ (45.81)
10/1/2022	\$ 831.36				\$ (831.36)	\$ (877.17)
11/1/2022	\$ 831.36				\$ (831.36)	\$ (1,708.53)
12/1/2022	\$ 831.36				\$ (831.36)	\$ (2,539.89)
1/1/2023	\$ 831.36				\$ (831.36)	\$ (3,371.25)
2/1/2023	\$ 831.36				\$ (831.36)	\$ (4,202.61)
3/1/2023	\$ 831.36				\$ (831.36)	\$ (5,033.97)
4/1/2023	\$ 831.36				\$ (831.36)	\$ (5,865.33)
5/1/2023	\$ 831.36				\$ (831.36)	\$ (6,696.69)
6/1/2023	\$ 831.36				\$ (831.36)	\$ (7,528.05)
7/1/2023	\$ 831.36				\$ (831.36)	\$ (8,359.41)
8/1/2023	\$ 831.36				\$ (831.36)	\$ (9,190.77)
9/1/2023	\$ 810.77				\$ (810.77)	\$ (10,001.54)
10/1/2023	\$ 810.77				\$ (810.77)	\$ (10,812.31)

IN THE UNITED STATES BANKRUPTCY COURT
FOR MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Charles B. Lang aka Charles B. Lang aka
Charles Lang
Debtor

Fay Servicing, LLC as servicer for US
Bank Trust National Association, Not In
Its Individual Capacity But Solely As
Owner Trustee For VRMTG Asset Trust
v.

Charles B. Lang aka Charles B. Lang aka
Charles Lang
Jack N. Zaharopoulos - Bankruptcy
Trustee
Respondents

CASE NO.: 20-00093-MJC

CHAPTER 13

Judge: Mark J. Conway

Hearing Date:

Objection Deadline:

CERTIFICATE OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on October 17, 2023.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was first-class mail and electronic notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: October 17, 2023

By: /s/ Lauren Moyer, Esq.
Lauren Moyer, Esq.
FRIEDMAN VARTOLO LLP
Attorneys for Movant
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

Service by Regular Mail

Charles B. Lang aka Charles B. Lang aka Charles Lang
210 Pheasant Run
Bushkill, PA 18324
Bankruptcy Debtor

Service by NEF

Jack N. Zaharopoulos
8125 Adams Drive, Suite A
Hummelstown, PA 17036
Bankruptcy Trustee

Asst. U.S. Trustee
1501 N. 6th St
Harrisburg, PA 17102
United States Trustee

Robert J. Kidwell
712 Monroe Street
Stroudsburg, PA 18360
Attorney